

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
Free Speech Systems LLC,	§	
	§	Case No. 22-60043 (CML)
Debtor.	§	

**PQPR HOLDINGS LIMITED, LLC’S MOTION TO EXPEDITE CONSIDERATION OF
AMENDED MOTION TO DIRECT SUBCHAPTER V TRUSTEE TO INVESTIGATE
FINANCIAL OPERATIONS OF THE DEBTOR**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

Expedited relief has been requested. If the Court considers the motion on an expedited basis, then you will have less than 21 days to answer. If you object to the requested relief or if you believe that the expedited consideration is not warranted, you should file an immediate response.

Expedited relief is requested on or before September 20, 2022.

PQPR Holdings Limited, LLC (“PQPR”), the secured creditor of the Debtor and a party-in-interest, respectfully submits this Motion to Expedite the Hearing on PQPR’s Amended Motion to Direct the Subchapter V Trustee to Investigate the Financial Operations of the Debtor [Dkt. 127], as follows:

1. The Subchapter V Trustee has agreed to conduct an investigation of the Debtor’s finances per PQPR’s motion.

2. PQPR desires that the investigation be commenced as soon as possible. PQPR has offered to make its consultant available to the Subchapter V Trustee to explain what he knows of the Debtor's financial operations and the debt owed to PQPR by the Debtor. It is hoped that such a meeting will greatly help the Subchapter V Trustee more quickly understand the operations. Because of such consultant's previously planned international travel commitments, that meeting would need to take place before September 14, 2022.

3. As stated in its motion, PQPR believes that an impartial but full examination of the Debtor is considerably less wasteful than adversarial discovery and hearing the currently pending Motion to (I) Appoint Tort Claimants Committee and (II) Remove the Debtor in Possession [Dkt. 102]. PQPR does not seek dismissal of such motion, but merely asks that it be considered only after the Subchapter V Trustee has had an opportunity to report the results of her investigation to the Court.¹

4. Because of the logistical and scheduling issues, PQPR requests that the hearing on its Amended Motion to Authorize and Direct Investigation by Trustee be considered on an expedited basis and requests a hearing on or before September 20, 2022, (when a Status Conference is already set in this case).

Dated: September 8, 2022

Respectfully submitted,

By: /s/ Stephen W. Lemmon
Stephen W. Lemmon
Texas Bar. No. 12194500
STREUSAND, LANDON, OZBURN
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¹ PQPR also does not seek the cancellation of the deposition of its corporate representative, currently scheduled for October 4, but does believe that such deposition should be limited to the issues concerning the PQPR debt (the deposition is noticed regarding the cash collateral motion). PQPR suggests that it would be in the best interests of all parties to wait on depositions until after the Subchapter V Trustee's investigation and report is complete, but previously committed to such deposition and will honor such commitment if the tort claimants believe that is a good use of their clients' time and money.

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ATTORNEYS FOR
PQPR HOLDINGS LIMITED, LLC

CERTIFICATE OF CONFERENCE

I hereby certify that on September 8, 2022, I conferred by email with counsel for the Texas Plaintiffs, the Connecticut Plaintiffs, the Debtor, Alex Jones, the Subchapter V Trustee, and the U.S. Trustee. Counsel for the tort claimants are opposed to expedited consideration. The Debtor is not apposed to expedited consideration. Neither the U.S. Trustee nor the sub V Trustee expressed an opinion.

/s/ Stephen W. Lemmon
Stephen W. Lemmon

CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2022, a true and correct copy of the foregoing instrument was served electronically on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system, and/or U.S.P.S. first class mail, including the following:

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U.S. Trustee

USPS Service List - Twenty Largest Unsecured Creditors

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